

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183-MEM

MOTION TO EXTEND DEADLINE FOR EXPORT REPORTS

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated November 13, 2018 (Doc. 27) entered by this Honorable Court, expert reports due are due from the Plaintiff on or before December 10, 2018; from the Defendant on or before January 10, 2019; supplementations, if any, by the Plaintiff on or before February 11, 2019 and by Defendant on or before March 11, 2019.
2. The Plaintiff is seeking to extend the deadlines for expert reports by one month.
3. The requested extension will not unreasonably delay trial.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the deadlines for expert reports.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Bar I.D. # PA 49625
gmk@mkpvlaw.com

/s/ Christopher J. Szewczyk, Esquire
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Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
P: (570) 348-0776
F: (570) 348-2755

Date: November 29, 2018

CERTIFICATE OF CONCURRENCE

The undersigned hereby certifies that on November 28, 2018, he contacted
A. James Hailstone, Esquire requesting concurrence in the foregoing motion.
Attorney Hailstone concurs in Plaintiff's request.

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: November 29, 2018

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 29th day of November, 2018.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire

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Defendants

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No. 3:17-CV-2183-MEM

ORDER

AND NOW, this _____ day of _____, 2018, based upon Plaintiff's Motion to Extend Deadline for Expert Reports, said motion is GRANTED. Expert reports from the Plaintiff are due on or before **January 15, 2019**; from the Defendant on or before **February 15, 2019**; supplementations, if any, by Plaintiff will be due on or before **March 15, 2019** and by Defendant on or before **April 15, 2019**.

BY THE COURT:

_____.J.